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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA (RENO)

ERIN ROBERTSON,

Plaintiff,

v.

INSURANCE PIPELINE, INC.,

Defendant.

Case No. 3:25-cv-00294-MMD-CLB

**ORDER GRANTING JOINT
STIPULATION TO EXTEND
DEFENDANT'S DEADLINE TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(SECOND REQUEST)

Defendant Insurance Pipeline, Inc. and Plaintiff Erin Robertson, through undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b) and District of Nevada Local Rule I.A. 6-1, submit this Second Joint Stipulation that Defendant shall have an additional 30-day extension of time to respond to Plaintiff's Complaint (D.E. 1), and state as follows:

1. On June 11, 2025, Plaintiff Erin Robertson filed her Complaint. D.E. 1.
2. On June 26, 2025, Defendant Insurance Pipeline, Inc. was served with the Summons and Complaint. D.E. 7.

3. On July 15, 2025, the parties filed a Joint Stipulation for Extension of Time for Defendant's Extension of Time to Respond to Plaintiff's Complaint, and the Court granted the Stipulation. D.E. 8, 9.

4. Defendant's response to the Complaint is currently due on Monday August 18, 2025.

5. With the deadline approaching, Defendant reached out to Plaintiff's counsel to seek an additional 30-day extension of time to file a response to the Complaint. And Plaintiff's counsel agrees to the requested 30-day extension for Defendant to respond to the Complaint.

6. The parties are exploring a potential settlement. This additional extension will facilitate those settlement discussions.

7. Further, Defendant's counsel has multiple upcoming deadlines in both federal and state court.

8. Defendant and Plaintiff file this Joint Stipulation, pursuant to District of Nevada Local Rule I.A. 6-1, for Defendant's response to the Complaint to be due on Tuesday, September 16, 2025.

9. This is the second stipulation for an extension of time to respond to the Complaint.

10. Pursuant to District of Nevada Local Rule I.A. 6-2, a proposed order appears on the last page of this stipulation.

Dated this 13th day of August, 2025

Respectfully submitted by:

By: /s/ Phillip Silvestri

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Attorneys for Plaintiff and Proposed Class

1 IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: August 14, 2025

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8 **CERTIFICATE OF SERVICE**

9 WE HEREBY CERTIFY that on August 13, 2025, a true and correct copy of the foregoing
10 was filed with this Court using CM/ECF, which sends notice to all parties registered for electronic
11 service.

12 /s/ Phillip A. Silvestri, Esq.
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